

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

| | |
|--|------------------------------|
| EDWARD L. CHEATHAM, LARRY GIST, : | Case No. 1:11-cv-0006 |
| WILLIAM HOLT, AND JAMES : | |
| TEEPLES, ON BEHALF OF : | Judge Sharp |
| THEMSELVES AND ALL OTHER : | |
| PERSONS SIMILARLY SITUATED, : | |
| Plaintiffs, : | |
| vs. : | |
| THE R.C.A. RUBBER COMPANY OF : | |
| AMERICA [sic], et al., : | |
| Defendants. : | |

**JOINT MOTION FOR FINAL
APPROVAL OF CLASS ACTION SETTLEMENT**

Come now the Plaintiffs and Defendants (collectively the “Parties”), by counsel, and pursuant to Federal Rule of Civil Procedure 23(e), jointly move the Court to enter an order granting final approval of the proposed settlement in this matter. As detailed in the attached Memorandum, this Court should finally approve the proposed settlement agreement (the “Agreement”), which is attached and incorporated herein by reference as “Exhibit 1” because the proposed resolution was the product of arms-length negotiations, is fair, reasonable, and adequate as to Plaintiffs, and is within the range of results that warrant final approval by this Court. A proposed order is attached to this Motion as “Exhibit 2”.

Respectfully submitted this 3rd day of February, 2015,

Lynn Agee, Esq.
3340 Perimeter Hill Drive
Nashville, TN 37211

s/William T. Payne/s (by email consent)
William T. Payne, Esq.
Feinstein Doyle Payne & Kravec, LLC
17th Floor, Allegheny Building
429 Forbes Avenue
Pittsburgh, PA 15219

Attorneys for Plaintiffs Cheatham, Gist, Holt and Teeple

AND

s/Jack F. Fuchs/s
Jack F. Fuchs (KY Bar # 84302)
THOMPSON HINE LLP
312 Walnut Street, Suite 1400
Cincinnati, OH 45202
Phone: 513-352-6741
Fax: 513-241-4771
Email: Jack.Fuchs@ThompsonHine.com

Dale V. Wilson
Ohio Bar No. 0005596
Wilson & Associates
570 Swartz Rd.
Akron, OH 44319
(330) 896-2200
(330) 896-2205 Fax
dale@dvwilsonlaw.com

Phillip G. Young, Jr.
Garfinkle, McLemore & Young, PLLC
22 Public Square, Suite 12
Columbia, TN 38401
(913) 381-0057
(913) 381-0058 Fax
pyoung@gmylaw.com

*Attorneys for Defendants The R.C.A. Rubber Company,
The Pulaski Rubber Company and The Pulaski Rubber Company Benefit Plan*

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing was served via ECF filing in United States District Court, this 3rd day of February, 2015 upon:

Lynn Agee, Esq.
3340 Perimeter Hill Drive
Nashville, TN 37211

William T. Payne, Esq.
Feinstein Doyle Payne & Kravec, LLC
17th Floor, Allegheny Building
429 Forbes Avenue
Pittsburgh, PA 15219

Attorneys for Plaintiffs Cheatham, Gist, Holt and Teeple

s/Jack F. Fuchs/s